IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA COLUMBUS DIVISION

UNITED STATES OF AMERICA :

v. : CRIMINAL NO. 4:25-CR- 3 (CDL)

CHARLES DANIEL : VIOLATIONS:

: 18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 922(d)

18 U.S.C. § 924(a)(1)(A)

18 U.S.C. § 924(a)(1)(D)

18 U.S.C. § 933(a)(1)

Defendant.

THE GRAND JURY CHARGES:

COUNT ONE

(Engaging in the Business of Dealing Firearms without a License)

From on or about October 2018 and continuing to on or about December 5, 2023, the exact dates unknown to the Grand Jury, in the Columbus Division of the Middle District of Georgia and elsewhere within the jurisdiction of this Court,

CHARLES DANIEL,

defendant herein, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO (Firearms Trafficking)

That between October 26, 2023 and December 5, 2023, the exact date unknown to the Grand Jury, in the Columbus Division of the Middle District of Georgia and elsewhere within the jurisdiction of this Court,

CHARLES DANIEL,

did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm, to wit: one (1) BRG Defense/Burgu Metal, Model: BRG9 Elite, 9x19 Caliber, Semiautomatic Pistol, Serial Number: TG019-22C13039, to a recipient, in and otherwise affecting interstate and foreign commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient, Sidney Person, would constitute a felony as defined in Title 18, United States Code, Section 932(a); all in violation of Title 18, United States Code, Section 933(a)(1).

COUNT THREE (Sale or Transfer of a Firearm to a Prohibited Person)

That on or between October 26, 2023 and December 5, 2023, the exact date unknown to the Grand Jury, in the Columbus Division of the Middle District of Georgia and elsewhere within the jurisdiction of this Court,

CHARLES DANIEL,

defendant herein, knowingly sold, transferred, and disposed of a firearm, that is, one (1) BRG Defense/Burgu Metal, Model: BRG9 Elite, 9x19 Caliber, Semiautomatic Pistol, Serial Number: TG019-22C13039, to Sidney Person, knowing and having reasonable cause to believe that Sidney Person had been convicted of a crime punishable by imprisonment for a term exceeding one year in violation of Title 18, United States Code, Sections 922(d) and 924(a)(8).

COUNT FOUR (False Statement During Purchase of a Firearm)

That on or about October 26, 2023, in the Columbus Division of the Middle District of Georgia and elsewhere within the jurisdiction of this Court,

CHARLES DANIEL,

knowingly made a false statement and representation to Money Mizer Pawn, a person licensed

under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Money Mizer Pawn in that the defendant executed and submitted to Money Mizer Pawn, a Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 Firearms Transaction Record, falsely stating: 1) that the defendant was the actual purchaser of the firearm and 2) that defendant was not intending to purchase or acquire any firearm for sale or other disposition to a prohibited person, when, in fact, defendant knew he was intending to purchase and acquire the firearm for sale and disposition to a prohibited person; all in violation of Title 18, United States Code, Section 924(a)(1)(A).

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

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C. SHANELLE BOOKER
ACTING UNITED STATES ATTORNEY

Presented by:

CHRISTOPHER WILLIAMS

ASSISTANT UNITED STATES ATTORNEY

Filed in open court this ____ day of January, 2025.

Deputy Clerk